

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BOARD OF TRUSTEES OF THE I.A.T.S.E.  
ANNUITY FUND, BOARD OF TRUSTEES OF THE  
I.A.T.S.E. NATIONAL HEALTH AND WELFARE  
FUND, AND BOARD OF TRUSTEES OF THE  
I.A.T.S.E. NATIONAL PENSION FUND,

Plaintiffs,

-against-

IRONMAN PRODUCTIONS, INC. AND  
LONESOME PRODUCER LLC,

Defendants.

**NOTICE OF PLAINTIFFS' MOTION  
FOR SUMMARY JUDGMENT**

Case No. 22-cv-10900 (AS)

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment and Plaintiffs' Rule 56.1 Statement; the Declaration of Michael Fife dated September 22, 2023 and exhibits thereto; the Declaration of Kimberly Miller dated September 22, 2023 and exhibits thereto; the Declaration of Sarasvati Spaur dated September 22, 2023 and exhibits thereto; and upon all pleadings and proceedings had herein, Plaintiffs Board of Trustees of the I.A.T.S.E. Annuity Fund, Board of Trustees of the I.A.T.S.E. National Health and Welfare Fund, and Board of Trustees of the I.A.T.S.E. National Pension Fund, by and through the undersigned attorneys, Spivak Lipton LLP, will move this Court before the Honorable Arun Subramanian, United States District Judge, at the United States District Court, Southern District of New York, located at 500 Pearl Street, New York, New York 10007, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting Plaintiffs' motion for summary judgment in its entirety, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's Order dated September 5, 2023 (ECF Dkt. No. 43), Defendants' answering papers must be filed and served by October 6, 2023, and Plaintiffs' reply papers must be filed and served by October 13, 2023.

Dated: New York, New York  
September 22, 2023

Respectfully submitted,

/s/  
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*Attorneys for Defendants*

As of October 12, 2023, Defendants have failed to respond to Plaintiffs' motion for summary judgment. By **October 13, 2023, at noon**, Defendants shall file any opposition papers and submit a letter explaining their untimeliness. SO ORDERED.



Arun Subramanian, U.S.D.J.  
Date: October 12, 2023